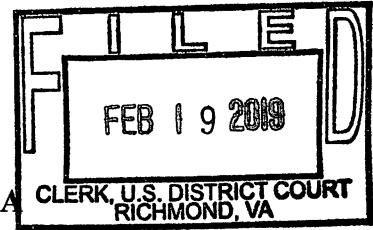


UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND VIRGINIA



ROBERT DAVID STEELE,

Plaintiff,

-against-

JASON GOODMAN,

Defendant.

17-CV-00601-MHL

**NOTICE OF MOTION, MOTION TO
INTERVENE, MEMORANDUM OF
LAW AND ARGUMENT**

NOTICE OF MOTION TO INTERVENE
AND
CERTIFICATE OF SERVICE

1. **NOTICE SHOULD BE TAKEN BY THE CLERK OF THE COURT AND ALL PARTIES** that the interested party known as D. GEORGE SWEIGERT is seeking the LEAVE OF THE COURT TO INTERVENE into this instant lawsuit pursuant to Fed. R. Civ. Proc. Rule 24(a) and Virginia Supreme Court Rule 3:14. (Rule 3:14 provides that “[a] new party may by leave of court file a pleading to intervene as a plaintiff or defendant to assert any claim or defense germane to the subject matter of the proceeding.”).

2. As no discovery has taken place and this instant lawsuit is in the pleading stages, the Court will note (as described in the accompanying pleadings) that this is a **TIMELY** motion.

3. The interested party (intervenor-applicant) D. George Sweigert purposes to intervene as a **PLAINTIFF**. As sworn below, the interested party has an interest in these proceedings and brings identical as the Plaintiff (Robert David Steele) to this Court. Sweigert maintains an interest in the outcome of these proceedings as described in the accompanying documents.

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 14/ day of February, 2019.



D. George Sweigert

**D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211**

It is hereby certified that the accompanying materials have been placed in the U.S. Postal Service with First Class mail postage affixed and addressed to the following parties:

**Steven Scott Biss
300 West Main St
Ste 102
Charlottesville, VA 22903**

**Jason Goodman
252 7th Avenue
New York, NY 10001**

**Richard Johan Conrod , Jr.
Kaufman & Canoles PC
150 W Main St
PO Box 3037
Norfolk, VA 23510**

**Clerk of the Court
U.S. District Court
701 E. Broad St.
Richmond, VA 23219**

**Terry Catherine Frank
Kaufman & Canoles PC
1021 E Cary St, Suite 1400
Two James Center
PO Box 27828
Richmond, VA 23219**

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 14/ day of February, 2019.



D. George Sweigert